

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

KEIYA PEEL AKA KEIYA M. CRUMBLE  
DEBTOR

## CHAPTER 13

NEWREZ D/B/A SHELLPOINT MORTGAGE  
SERVICING AS SERVICER FOR WELLS FARGO  
BANK, NATIONAL ASSOCIATION, NOT IN ITS  
INDIVIDUAL OR BANKING CAPACITY, BUT  
SOLELY AS TRUSTEE ON BEHALF OF THE  
LAKE COUNTRY MORTGAGE LOAN TRUST  
2006-HE1  
MOVANT  
vs.

NO. 18-14207-MDC

11 U.S.C. Section 362

KEIYA PEEL AKA KEIYA M. CRUMBLE  
DEBTOR

WILLIAM C. MILLER, ESQ.  
TRUSTEE

**NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE**

NewRez LLC d/b/a Shellpoint Mortgage Servicing as servicer for Wells Fargo Bank, National Association, not in its individual or banking capacity, but solely as Trustee on behalf of the Lake Country Mortgage Loan Trust 2006-HE1 has filed a Motion for Relief from Stay, with the court for Relief from the Automatic Stay of Section 362.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the motion, then on or before 05/29/2020 you or your attorney must do all of the following:

(a) file an answer explaining your position at:

United States Bankruptcy Court  
Robert N.C. Nix Building  
900 Market Street, Suite 400  
Philadelphia, PA 19107-4299

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to Movant's attorney:  
Joshua I. Goldman, Esq.  
PADGETT LAW GROUP  
6267 Old Water Oak Road, Suite 203

Tallahassee, FL 32312

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Magdeline D. Coleman, the United States Bankruptcy Judge, in Courtroom 2 at the United States Bankruptcy Court, Robert N.C. Nix Building, 900 Market Street, Suite 400, Philadelphia, PA 19107-4299 on 6/9/2020 , at 10:30 AM, or as soon thereafter as counsel can be heard, to consider the motion.

4. You may contact the Bankruptcy Clerk's office for Philadelphia cases at (215) 408-2800 and for Reading cases at 610-208-5040 to find out whether the hearing has been canceled because no one filed a response.

5. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

/s/ Joshua I. Goldman  
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Pennsylvania Bar # 205047  
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*Counsel for Creditor*

May 14, 2020